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VIA ECF

Hon. Valerie E. Caproni
United States District Court for the
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

MEMO ENDORSED

Re: *U.S. Bank National Association v. Joeefi LLC, et al.*
Case No.: 1:24-cv-03966 (VEC)

Dear Judge Caproni:

We are writing as counsel for the plaintiff, U.S. Bank National Association as Trustee for the benefit of the Holders of J.P. Morgan Chase Commercial Mortgage Securities Corp., Multifamily Mortgage Pass-Through Certificates, Series 2018-SB47 (the "Plaintiff") in the above-referenced case to respectfully request a brief extension of the date to move for default judgment against the Defaulting Defendants (defined below).

On January 17, 2025, Your Honor ordered Plaintiff to move for default judgment against defendants Blue Whale East 182nd LLC, Shony & G Corp., City of New York Department of Environmental Control, and Department of Housing Preservation and Development (the "Defaulting Defendants") on or before January 31, 2025. Plaintiff is also required to move for summary judgment against defendants Joeefi LLC, the Estate of Joseph Goldberger, and Eva Goldberger (the "Answering Defendants") by February 14, 2025. [ECF 56.]

For reasons of judicial efficiency, Plaintiff respectfully requests a brief extension of the default judgment deadline to **February 14, 2025**, to allow Plaintiff to file a combined motion addressing both default judgment against the Defaulting Defendants and summary judgment against the Answering Defendants. Consolidating these filings aligns with the approach often employed in foreclosure actions, where (as here) default judgments are sought against parties who were named solely for notice purposes or may be subordinated lienors. In its summary judgment motion, Plaintiff expects to move for reference to a magistrate to calculate the amount due—a calculation that is applicable both to the Answering Defendants and the Defaulting Defendants.

Plaintiff believes providing a single deadline will streamline resolution of this matter and minimize duplicative filings. Answering Defendants are not affected by this request, and Defaulting Defendants will not be prejudiced by this extension. This is Plaintiff's first request for an extension.

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We thank the Court for its consideration of this request.

Respectfully submitted,

AKERMAN LLP

By: /s/ *Mark S. Lichtenstein*

Mark S. Lichtenstein

Counsel for the Plaintiff

cc: All Counsel of Record (via ECF)

Application GRANTED. Plaintiff's deadline to move for default judgment is ADJOURNED from Friday, January 31, 2025, to **Friday, February 14, 2025**. Plaintiff is permitted to file a combined motion for default judgment against Defaulting Defendants and summary judgment against Answering Defendants on that date.

SO ORDERED.



1/28/2025

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE